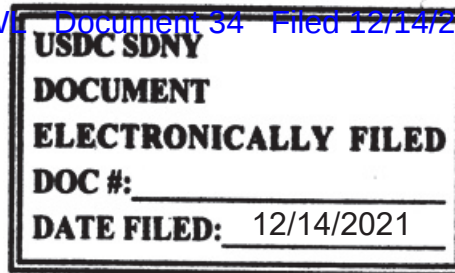




STEIN | SAKS, PLLC



YAAKOV SAKS▲.*
 JUDAH STEIN▲.
 ELIYAHU BABAD▲.
 RAPHAEL DEUTSCH▲
 DAVID FORCE▲.
 NAKICHA JOSEPH▲
 MARK ROZENBERG▪
 KENNETH WILLARD▲.

▲ NJBar Admissions

^ CT & NJ Bar Admissions

▪ NY Bar Admission

*Federal Court Bar Admissions

AR, CT, CO, DC, IL, MI, MO, ND, NE, NM, TN, TX, WI

One University Plaza, Suite 620, Hackensack, NJ 07601 | tel: 201.282.6500 | fax: 201.282.6501 | www.steinsakslegal.com

December 8, 2021

Via CM/ECF

The Honorable Robert W. Lehrburger
 United States District Court
 Southern District of New York

RE: *Monegro v. Grace Products, Inc.*
Case No.: 1:20-cv-10167

Dear Judge Lehrburger:

In accordance with Local Civil Rule 37.2 and Your Honor's Individual Practice II.D., Plaintiff Jenisa Angeles submits this letter to request an informal conference to resolve a discovery dispute with Defendant Grace Products, Inc. The parties having met and conferred, have not been able to resolve this dispute.

Plaintiff served Defendant with written discovery on October 13, 2021. Nevertheless, Defendant failed to furnish its responses by the due date of November 12. On November 15, Plaintiff emailed Defendant to inquire as to the status of the late discovery responses, and asked to meet and confer to discuss the situation. Defendant's counsel did not reply to Plaintiff's inquiry, nor to a follow-up message left on November 19.

On November 23, 2021, Plaintiff telephoned Defendant to meet and confer regarding the discovery dispute. On this call, Defendant's counsel represented that he would either respond to discovery, or provide an update, by November 30. Subsequently, Defendant failed to reply by November 30.



In an email exchange on December 2, Plaintiff gave Defendant until the morning of December 8 to provide the discovery responses. However, as of the writing of this letter, Defendant's counsel has not furnished any of the discovery responses, nor has he replied to update Plaintiff as to the responses' status.

Plaintiff now seeks the Court's intervention to resolve this discovery dispute so that she may prosecute this case.

We thank the Court for its kind consideration and courtesies.

Respectfully Submitted,

/s/ Mark Rozenberg

By: Mark Rozenberg, Esq.

Request for conference is GRANTED. The Court will schedule a conference with the parties.

SO ORDERED:

12/14/2021

A handwritten signature in black ink, appearing to be 'R. Lehrburger', written over a horizontal line.

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE